

BWP On-Site Class A Recycling Guidance

On February 27, 2004, the Massachusetts Department of Environmental Protection (DEP) replaced its permit requirement for facilities engaged in On-Site Recycling of Class A Regulated Recyclable Materials (RRMs) with a requirement that these facilities submit a one-time notification to DEP before they begin recycling, and then adhere to specific performance standards thereafter. See 310 CMR 30.222 for additional information.

On-Site Class A RRM Recycling may involve waste oil/used oil fuel burning in approved space heaters; solvent recovery in free standing distillation units; or silver recovery using stand-alone silver recovery units not subject to the Environmental Results Program (ERP, see 310 CMR 71.000).

Facilities that did not have DEP Class A Recycling Permits by February 27, 2004, are required to notify DEP before beginning on-site recycling activities. Facilities that had DEP Class A Recycling Permits by that date are not required to submit notifications. The notification form contains five sections:

Section A requires general information such as company name, address and EPA Identification number. If your company does not have an EPA Identification number or a DEP-assigned number, complete and submit to the Department the appropriate generator identification number application form found at <http://www.mass.gov/dep/bwp/dhm/hwforms.htm>. Or you can obtain an application from the nearest DEP regional office (see <http://www.mass.gov/dep/cities.htm> or the last page of the notification form) or by calling the DEP Hazardous Waste Compliance Assistance Line at (617) 292-5898.

Section B requires you to describe the material to be recycled and identify the appropriate Recycling Activity.

- Part B 1 - Waste Oil/Use Oil Fuel to be burned for energy recovery in a Space Heater. Contact your local fire department about its permitting requirements.
- Part B 2 - Spent Photographic Fixer (containing Silver). Identify the type of silver recovery process used in the freestanding unit; more than one process may apply.
- Part B 3- Spent Solvent reclaimed for on-site reuse in a Free-Standing Distillation Unit.
- Part B 4 – If your facility is conducting on-site recycling other than the materials/activity described in Parts B1 through B3, check off the appropriate activity that applies to your facility. For assistance contact the Bureau of Waste Prevention Recycling Permit Writer at your local DEP regional office.

Section C provides information about pollution prevention and toxics use reduction requirements that may apply to your facility. See <http://www.mass.gov/dep/bwp/dhm/tura/turhome.htm> or call (617) 292-5982 to determine if TURA requirements apply to you. There are no questions to answer in this section.

Section D requires a certification that the information contained on the form is true, accurate and complete and that you have read and understand all the conditions set forth in the package.

Section E describes the general requirements that hazardous waste recyclers must comply with. The summary is provided for your information. There are no questions to answer in this section.

Notification forms should be sent *by certified mail* to the appropriate Regional Office (see <http://www.mass.gov/dep/cities.htm> or the last page of the notification form). Be sure to retain a copy of the form for your records. If you have any questions about the notification form, the regulations or the performance standards, please call the Hazardous Waste Compliance Assistance Line at (617) 292-5898.



Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Hazardous Waste
On-Site Class A Recycling Notification Form

Facility ID (when known) _____

A. General Information

Please mail to appropriate DEP Regional Office as listed on the last page of this form.

Important:

When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



1. Facility:

Located in DEP region: ☐ Western ☐ Central ☐ Northeast ☐ Southeast

a. Facility Name _____

b. Facility Address _____

c. City/Town _____

d. Zip Code _____

e. EPA Identification Number or MA Identification Number _____

2. Person on-site responsible for supervising recycling activity:

a. First Name _____

b. Last Name _____

c. Area Code and Telephone # _____

3. Mailing address (when different from above facility address):

a. Street Address line 1 _____

b. Street Address line 2 _____

c. City/Town _____

d. Zip Code _____

e. On-site Supervisor's E-mail Address _____

B. Description of Recycling Materials and Activity

Describe Units:
P = pounds
L = liters
K = kilograms,
G = gallons

1. ☐ a. Waste Oil:

b. Hazardous Waste Code _____

Quantity recycled per calendar year:

c. Amount _____

d. Units _____

e. Fire department permit number _____

2. ☐ a. Spent Photographic Fixer:

b. Hazardous waste code(s) _____

Quantity recycled per calendar year:

c. Amount _____

d. Units _____

☐ e. Free standing silver recovery unit

Type: ☐ 1. Electrolytic ☐ 2. Canister steel wool ☐ 3. Other

4. Describe other _____



Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Hazardous Waste
On-Site Class A Recycling Notification Form

Facility ID (when known) _____

B. Description of Recycling Material and Activity (cont.)

Describe Units:

P = pounds

L = liters

K = kilograms,

G = gallons

3. ☐ a. Spent Solvents:

Quantity recycled per calendar year:

b. Amount _____

c. Units (1) _____

☐ d. Free standing distillation unit:

e. Manufacturer name _____

f. Model number _____

☐ g. Other solvent recycling activity:

h. Describe _____

i. Recyclable material type (Identify each solvent) _____

j. Hazardous waste code(s) _____

k. Recyclable material type (Identify each solvent) _____

l. Hazardous waste code(s) _____

m. Recyclable material type (Identify each solvent) _____

n. Hazardous waste code(s) _____

o. Recyclable material type (Identify each solvent) _____

p. Hazardous waste code(s) _____

4. ☐ a. Other on-site recycling activity:

Describe Units:

P = pounds

L = liters

K = kilograms,

G = gallons

b. Describe materials to be recycled _____

c. Hazardous waste code _____

Quantity recycled per calendar year:

d. Amount _____

e. Units _____

f. Identify the Class A Material Category(s) that applies to recyclable material (310 CMR 30.212) - check all that apply:

☐ 1. (1) (a) Used or reused as an ingredient in a product without reclamation

☐ 2. (1)(b) Substitute for commercial product

☐ 3. (1)(c) Substitute for feedstock in original process without reclamation

☐ 4. (2) Industrial Ethyl Alcohol being reclaimed

☐ 5. (3) Scrap metal that would be hazardous if disposed of

☐ 6. (4) Used oil fuel burned at the site of generation for energy recovery in a used oil fuel fired space heater in compliance with 310 CMR 30.222 and 30.256

☐ 7. (5) Characteristic sludge being reclaimed

☐ 8. (6) Characteristic by-product being reclaimed

☐ 9. (7) Unused commercial chemical product being reclaimed

☐ 10. (8) Waste oil recycled by other than burning for energy recovery

☐ 11. (9) Specification used oil fuel burned for energy recovery in a fossil fuel utilization facility other than a used oil fuel fired space heater and otherwise handled in compliance with 310 CMR 30.250

☐ 12. (10) Material recycled in a completely enclosed recycling system at site of generation, except such material recycled at a photo processor or a printer subject to 310 CMR 71.00 (e.g., stand-alone solvent stills, stand-alone silver recovery units)



Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Hazardous Waste
On-Site Class A Recycling Notification Form

Facility ID (when known) _____

B. Description of Recycling Material and Activity (cont.)

g. Describe recycling activity (include a description of the process generating the material)

5. Type of accumulation:

- | | | |
|---|-------------------------------|-------------------------|
| <input type="checkbox"/> underground tanks | _____ a. Number of Tanks | _____ b. Total Capacity |
| <input type="checkbox"/> above ground tanks | _____ c. Number of Tanks | _____ d. Total Capacity |
| <input type="checkbox"/> 55 gallon drums | _____ e. Number of Drums | _____ f. Total Capacity |
| <input type="checkbox"/> other containers | _____ g. Number of Containers | _____ h. Total Capacity |

C. Pollution Prevention and Toxics Use Reduction

The Massachusetts Toxics Use Reduction Act (TURA, M.G.L. Chapter 21 I), passed in 1989, aims to reduce the use of toxic and hazardous substances in the Commonwealth. Facilities subject to the TURA are required to analyze chemical use, submit annual reports, and pay fees based on their use of toxic substance. Facilities subject to SARA 313 and CERCLA are required to report their chemical use under TURA. It may, therefore, benefit a company to reduce their

use of toxics so as to avoid reporting requirements and associated fees. In order to fall under TURA, companies must manufacture or process at least 25,000 pounds or otherwise use 10,000 pounds of the chemicals listed under SARA 313 or CERCLA. Companies must also employ ten or more full time workers and fall within certain SIC Codes. Call 617-292-5982 to determine if your company must report its chemical use.

D. Certification

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and, that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment. In addition, I understand that any material supplied with this application will not be considered confidential unless I have specifically requested that such material be kept confidential and the Department has made a determination of confidentiality in accordance with 310 CMR 3.00 - Regulations Governing Access for and Confidentiality of Department Records and Files."

_____ 1. Authorized signature of owner/operator

_____ 2. Title

_____ 3. Print name

_____ 4. Date (mm/dd/yyyy)



Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Hazardous Waste
On-Site Class A Recycling Notification Form

Facility ID (when known)

E. General Conditions of On-Site Class A Recycling Activity

- I. 30.222(5) General Performance Standards: Small Quantity Generator or Large Quantity Generator of Class A regulated recyclable materials that are exempt from Class A permitting requirements at 30.212(3)(a)1 shall:

- (a) Notify and obtain a generator identification number in compliance with 310 CMR 30.061, unless the generator has previously notified and obtained a generator identification number;
- (b) Submit a one-time notification form to the Department on a form prescribed by the Department prior to or upon commencing a Class A recycling operation, unless the generator has a Class A recycling permit for the recycling operation;
- (c) Manage regulated recyclable materials that are not recycled or otherwise handled in compliance with 310 CMR 30.220 as hazardous waste shall be accumulated, collected, transported, stored, treated, and disposed of in compliance with all the requirements of 310 CMR 30.000 other than 310 CMR 30.200;

- (d) Comply with the following conditions of 30.205;

30.205(5) Duty to Provide Information. The permittee shall provide the Department, within a reasonable time, any information which the Department may request and which is deemed by the Department to be relevant in determining whether a cause exists to modify, revoke, or suspend a permit, or to determine whether the permittee is complying with the terms and conditions of the permit.

30.205(7) Records. All records and copies of all applications, reports, and other documents required by 310 CMR 30.200 shall be kept by the permittee for at least three years from the expiration of the permit. This period shall be automatically extended for the duration of any enforcement action. This period may be extended by order of the Department. All record-keeping shall be in compliance with 310 CMR 30.007.

30.205(9) Preventing and Reporting Releases Into the Environment. No materials that are to be recycled shall be intentionally released into the environment or otherwise disposed of within Massachusetts except in full compliance with all applicable provisions of 310 CMR 30.000. All accidental releases of recyclable material shall be immediately reported to the Department and to all other persons to whom such releases must be reported pursuant to State or Federal laws or regulations.

30.205(14) Speculative Accumulation. Speculative accumulation is prohibited. The permittee shall make and keep records that will adequately demonstrate that there has occurred no speculative accumulation. Such records shall include, but not be limited to, the following:

- (a) records showing the amount of material being accumulated or stored at the beginning of the calendar year;
- (b) records showing the amount of material received or generated during the calendar year; and
- (c) records showing the amount of materials being accumulated or stored at the end of the calendar year.

30.205(15) Personnel Training. The permittee shall instruct, or give on-the-job training to, personnel involved in any activity authorized by the permit, so that such instruction or on-the-job training teaches such personnel how to comply with the conditions of the permit and to carry out the authorized activity in a manner that is not hazardous to public health, safety, or welfare, or the environment.

30.205(16) Emergency Prevention and Response. The permittee shall plan and prepare for fires, explosions, or other occurrences that might result in release of oil or hazardous materials to the environment or otherwise constitute a potential hazard to public health, safety, or welfare, or the environment. Without limiting the generality of the foregoing, if the permit authorizes the operation of a recycling facility, the design and operation of the recycling facility shall be in compliance with the requirements set forth in 310 CMR 30.524(1).

30.205(19) Storage and Accumulation in Tanks and Containers. Regulated recyclable materials shall be stored or accumulated only in tanks or containers. Generators of regulated recyclable materials that are waste oil or used oil fuel shall comply with 310 CMR 30.253. Generators of all other regulated recyclable materials shall comply with 310 CMR 30.340 (for large quantity generators), 30.351 (small quantity generators), or 30.353 (very small quantity generators), as applicable.

If the permittee stores or accumulates the regulated recyclable material in containers, such containers shall be in compliance with the requirements set forth or referred to in 310 CMR 30.683 through 30.686 and 30.688 through 30.689.

Each tank or container in which regulated recyclable material is being accumulated or stored and each outside container into which small containers are packed shall be clearly marked and labeled throughout the period of accumulation or storage with the following:

- (a) The words "Regulated Recyclable Material";
- (b) The regulated recyclable material(s) identified in words (e.g., acetone, toluene);
- (c) The type of hazard(s) associated with the material(s) indicated in words (e.g., ignitable, toxic, dangerous when wet);
- (d) The date upon which each period of accumulation or storage begins, marked on each tank or container at the time accumulation or storage begins in that tank or container, except that tanks and containers containing regulated recyclable materials to be lawfully recycled in used oil fired space heaters need not be dated. Marks and labels shall be placed on the sides of each tank or container in such a manner that they are clearly visible for inspection.

Note: the storage and accumulation requirements do not apply to generators of silver bearing Class A regulated recyclable materials in stand-alone silver recovery units at the site of generation, which are subject to tank and container requirements of 310 CMR 71.00.



Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Hazardous Waste
On-Site Class A Recycling Notification Form

Facility ID (when known)

E. General Conditions of On-Site Class A Recycling Activity (cont.)

30.222(5)(e) Use, operate and maintain recycling units that are appropriately designed for the material being recycled in accordance with the manufacturers recommended operation procedures.

30.222(5)(f) Retain documentation that any recycling unit used to recycle Class A regulated recyclable materials has been tested and listed in accordance with the applicable UL Standard or has been otherwise approved by or designed in accordance with standards of any nationally recognized engineering organization or testing laboratory, as applicable.

30.222(5)(g) Manage as a hazardous waste any residual material produced by recycling Class A RRM's at the site of generation pursuant to 310 CMR 30.140(2)(b), if the residual is a listed waste or exhibits the characteristics of a hazardous waste.

30.222(5)(h) Do not mix either regulated recyclable material or residual material produced by recycling Class A RRM's at the site of generation with hazardous waste

30.222(5)(i) Maintain documentation that the material is a Class A regulated recyclable material described in 310 CMR 30.212 and that it would be a hazardous waste if discarded (see "Determination of Whether a Waste is a Hazardous Waste" at 310 CMR 30.302).

30.222(5)(j) If reclaiming a Class A RRM at the site of generation, recover a useable product that meets commercial specifications for the product's intended use, and that requires no further reclamation prior to being used as a commercial ingredient in an on-site manufacturing process or being sold commercially.

Note: 310 CMR 30.222(5)(j) applies to categories of Class A Regulated Recyclable Materials defined in 310 CMR 30.212 (2), (5)-(8) and (10), provided that, for solvents recycled at the site of generation in stand-alone solvent stills, the reclaimed solvent may not be sold commercially.

II. 30.222(6) Specific Performance Standards: All generators of Class A regulated recyclable material exempt from Class A permit requirements pursuant to 310 CMR 30.212(3)(a)1. and 30.212(3)(a)2. shall comply with the following, as applicable:

30.222(6)(a)-Used oil fuel fired space heaters.

30.222(6)(b)-Stand-alone solvent still.

30.222(6)(c)-Silver recovery units.

30.222(6)(d)- Specification used oil fuel burned for energy recovery in a fossil fuel utilization facility other than a used oil fuel fired space heater.



Massachusetts Department of Environmental Protection

Regional Addresses and Phone Numbers

DEP Western Region

436 Dwight Street
Springfield, MA 01103
Phone: (413) 784-1100
Fax: (413) 784-1149



Adams
Agawam
Alford
Amherst
Ashfield
Becket
Belchertown
Bernardston
Blandford
Brimfield
Buckland
Charlemont
Cheshire
Chester
Chesterfield
Chicopee
Clarksburg

Colrain
Conway
Cummington
Dalton
Deerfield
Easthampton
East Longmeadow
Egremont
Erving
Florida
Gill
Goshen
Granby
Granville
Great Barrington
Greenfield
Hadley

Hampden
Hancock
Hatfield
Hawley
Heath
Hinsdale
Holland
Holyoke
Huntington
Lanesborough
Lee
Lenox
Leverett
Leyden
Longmeadow
Ludlow
Middlefield

Monroe
Montague
Monterey
Montgomery
Monson
Mount Washington
New Ashford
New Marlborough
New Salem
North Adams
Northampton
Northfield
Orange
Otis
Palmer
Pelham
Peru

Pittsfield
Plainfield
Richmond
Rowe
Russell
Sandisfield
Savoy
Sheffield
Shelburne
Shutesbury
Southampton
South Hadley
Southwick
Springfield
Stockbridge
Sunderland
Tolland

Tyringham
Wales
Ware
Warwick
Washington
Wendell
Westfield
Westhampton
West Springfield
West Stockbridge
Whately
Wilbraham
Williamsburg
Williamstown
Windham
Worthington

DEP Central Region

627 Main Street
Worcester, MA 01608
Phone: (508) 792-7650
Fax: (508) 792-7621
TDD: (508) 767-2788



Acton
Ashburnham
Ashby
Athol
Auburn
Ayer
Barre
Bellingham
Berlin
Blackstone
Bolton
Boxborough
Boylston
Brookfield

Charlton
Clinton
Douglas
Dudley
Dunstable
East Brookfield
Fitchburg
Gardner
Grafton
Groton
Harvard
Hardwick
Holden
Hopedale

Hopkinton
Hubbardston
Hudson
Holliston
Lancaster
Leicester
Leominster
Littleton
Lunenburg
Marlborough
Maynard
Medway
Mendon
Milford

Millbury
Millville
New Braintree
Northborough
Northbridge
North Brookfield
Oakham
Oxford
Paxton
Pepperell
Petersham
Phillipston
Princeton
Royalston

Rutland
Shirley
Shrewsbury
Southborough
Southbridge
Spencer
Sterling
Stow
Sturbridge
Sutton
Templeton
Townsend
Tyngsborough
Upton

Uxbridge
Warren
Webster
Westborough
West Boylston
West Brookfield
Westford
Westminster
Winchendon
Worcester

DEP Southeast Region

20 Riverside Drive
Lakeville, MA 02347
Phone: (508) 946-2700
Fax: (508) 947-6557
TDD: (508) 946-2795



Abington
Acushnet
Attleboro
Avon
Barnstable
Berkley
Bourne
Brewster
Bridgewater
Brockton
Carver
Chatham
Chilmark

Dartmouth
Dennis
Dighton
Duxbury
Eastham
East Bridgewater
Easton
Edgartown
Fairhaven
Fall River
Falmouth
Foxborough
Franklin

Freetown
Gay Head
Gosnold
Halifax
Hanover
Hanson
Harwich
Kingston
Lakeville
Mansfield
Marion
Marshfield
Mashpee

Mattapoisett
Middleborough
Nantucket
New Bedford
North Attleborough
Norton
Norwell
Oak Bluffs
Orleans
Pembroke
Plainville
Plymouth
Plympton

Provincetown
Raynham
Rehoboth
Rochester
Rockland
Sandwich
Scituate
Seekonk
Sharon
Somerset
Stoughton
Swansea
Taunton

Tisbury
Truro
Wareham
Wellfleet
West Bridgewater
Westport
West Tisbury
Whitman
Wrentham
Yarmouth

DEP Northeast Region

One Winter Street
Boston, MA 02108
Phone: (617) 654-6500



Amesbury
Andover
Arlington
Ashland
Bedford
Belmont
Beverly
Billerica
Boston
Boxford
Braintree
Brookline
Burlington
Cambridge
Canton
Carlisle

Chelmsford
Chelsea
Cohasset
Concord
Danvers
Dedham
Dover
Dracut
Essex
Everett
Framingham
Georgetown
Gloucester
Groveland
Hamilton
Haverhill

Hingham
Holbrook
Hull
Ipswich
Lawrence
Lexington
Lincoln
Lowell
Lynn
Lynnfield
Malden
Manchester-By-The-Sea
Marblehead
Medfield
Medford
Melrose

Merrimac
Methuen
Middleton
Millis
Milton
Nahant
Natick
Needham
Newbury
Newburyport
Newton
Norfolk
North Andover
North Reading
Norwood
Peabody

Quincy
Randolph
Reading
Revere
Rockport
Rowley
Salem
Salisbury
Saugus
Sherborn
Somerville
Stoneham
Sudbury
Swampscott
Tewksbury
Topsfield

Wakefield
Walpole
Waltham
Watertown
Wayland
Wellesley
Wenham
West Newbury
Weston
Westwood
Weymouth
Wilmington
Winthrop
Woburn